

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA,

V.

KEITH CHURN

)
)
)
)
)

No. 3:10-00116
Judge Haynes

MOTION TO CONTINUE TRIAL

OWD/MC
This motion
will be heard
on the morning
of trial.
[Signature]
11/27/13
12-2-13

Comes now the Defendant, by and through counsel, and would move the Court for an Order continuing the trial of this case that is currently set to begin on December 3, 2013 until a date in January 2014, that is convenient with the Court's calendar. As grounds for this request counsel would show the Court the following.

The Defendant in this case is charged with thirteen (13) counts of bank fraud. The trial is expected to take three (3) days and is expected to involve approximately five (5) government witnesses and two (2) to three (3) defense witnesses. The Defendant has been on pre-trial release since the inception of this case and has always complied with pretrial services and the Orders of this Court regarding pre-trial release.

The basis for the motion to continue has been included in the contemporaneously filed declaration of counsel that has been filed under seal and directly relates to counsel's ability to be fully prepared for trial by December 3, 2013.

Counsel has consulted with the Assistant United States Attorneys in this case regarding this Motion and has explained some of the underlying reasons for the motion. They have expressed opposition to the granting of the Motion.